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7 **UNITED STATES DISTRICT COURT**
 8 **DISTRICT OF NEVADA**

9 LANCE DOWNES-COVINGTON, an individual,
 10 SOLDADERA SANCHEZ, an individual,
 ROBERT O'BRIEN, an individual,
 11 EMILY DRISCOLL, an individual, ALISON
 KENADY, an individual, TENISHA MARTIN,
 12 an individual, GABRIELA MOLINA, an
 individual,

13 Plaintiffs,

14 vs.

15 LAS VEGAS METROPOLITAN POLICE
 16 DEPARTMENT, in its official capacity;
 LIEUTENANT KURT MCKENZIE, as an
 individual and in his capacity as a Las Vegas
 Metropolitan Police Department Officer;
 17 OFFICER TABATHA DICKSON, as an
 individual and in her capacity as a Las Vegas
 Metropolitan Police Department Officer;
 CAPTAIN PATRICIA SPENCER, as an
 18 individual and in her capacity as a Las Vegas
 Metropolitan Police Department Officer;
 CAPTAIN DORI KOREN, as an individual and
 19 in his capacity as a Las Vegas Metropolitan Police
 Department Officer; EVAN SPOON, as an
 individual and in his capacity as a Las Vegas
 Metropolitan Police Department Officer;
 20 JORDAN TURNER, as an individual and in his
 capacity as a Las Vegas Metropolitan Police
 Department Officer; UNKNOWN OFFICERS 1-
 21 14, as individuals and in their capacity as Las
 Vegas Metropolitan Police Department Officers,

22 Defendants.

Case. No.: 2:20-cv-01790-CDS-DJA

STIPULATION AND ORDER TO
EXTEND DISCOVERY PLAN
AND SCHEDULING ORDER
DEADLINES

(TENTH REQUEST)

1 IT IS HEREBY STIPULATED AND AGREED between Plaintiffs LANCE
 2 DOWNES-COVINGTON, SOLDADERA SANCHEZ, ROBERT O'BRIEN, EMILY
 3 DRISCOLL, ALISON KENADY, TENISHA MARTIN, and GABRIELA MOLINA
 4 (collectively "Plaintiffs") and Defendants LAS VEGAS METROPOLITAN POLICE
 5 DEPARTMENT, LIEUTENANT KURT MCKENZIE, OFFICER TABATHA DICKSON,
 6 CAPTAIN PATRICIA SPENCER, CAPTAIN DORI KOREN, EVAN SPOON, JORDAN
 7 TURNER, and UNKNOWN OFFICERS 1-14 (collectively "LVMPD Defendants"), by and
 8 through their respective counsel, that the discovery cut-off date of July 3, 2023, (and related
 9 deadlines) be extended for a period of **sixty (60) days**. This Stipulation is being entered in
 10 good faith and not for the purposes of delay (supplemented information noted in **bold-face**
 11 type).

12 **I. STATUS OF DISCOVERY.**

13 **A. PLAINTIFFS' DISCOVERY.**

14 1. Plaintiffs' Initial Disclosure of Witnesses and Documents Pursuant to FRCP
 15 26.1(a)(1) dated January 20, 2021;

16 2. Plaintiff Lance Downes-Covington's Responses to LVMPD's First Set of
 17 Interrogatories dated May 13, 2021;

18 3. Plaintiff Soldadera Sanchez's Responses to LVMPD's First Set of
 19 Interrogatories dated May 13, 2021;

20 4. Plaintiff Robert O'Brien's Responses to LVMPD's First Set of
 21 Interrogatories dated May 13, 2021;

22 5. Plaintiff Emily Driscoll's Responses to LVMPD's First Set of
 23 Interrogatories dated May 13, 2021;

24 6. Plaintiff Alison Kenady's Responses to LVMPD's First Set of
 25 Interrogatories dated May 13, 2021;

26 7. Plaintiff Tenisha Martin's Responses to LVMPD's First Set of
 27 Interrogatories dated May 13, 2021;

1 8. Plaintiff Gabriela Molina's Responses to LVMPD's First Set of
2 Interrogatories dated May 13, 2021;

3 9. Plaintiff Lance Downes-Covington's Responses to LVMPD's First Set of
4 Requests for Production of Documents dated May 13, 2021;

5 10. Plaintiff Soldadera Sanchez's Responses to LVMPD's First Set of Requests
6 for Production of Documents dated May 13, 2021;

7 11. Plaintiff Robert O'Brien's Responses to LVMPD's First Set of Requests for
8 Production of Documents dated May 13, 2021;

9 12. Plaintiff Emily Driscoll's Responses to LVMPD's First Set of Requests for
10 Production of Documents dated May 13, 2021;

11 13. Plaintiff Alison Kenady's Responses to LVMPD's First Set of Requests for
12 Production of Documents dated May 13, 2021;

13 14. Plaintiff Tenisha Martin's Responses to LVMPD's First Set of Requests for
14 Production of Documents dated May 13, 2021;

15 15. Plaintiff Gabriela Molina's Responses to LVMPD's First Set of Requests
16 for Production of Documents dated May 13, 2021;

17 16. Plaintiff Lance Downes-Covington's First Set of Interrogatories to LVMPD
18 dated June 2, 2021;

19 17. Plaintiffs' First Set of Requests for Production of Documents to LVMPD
20 dated June 2, 2021;

21 18. Plaintiff Emily Driscoll's First Set of Interrogatories to LVMPD dated July
22 1, 2021;

23 19. Plaintiffs' First Supplement to Initial Disclosure of Witnesses and
24 Documents Pursuant to FRCP 26.1(a)(1) dated July 1, 2021;

25 20. Plaintiffs' Second Supplement to Initial Disclosure of Witnesses and
26 Documents Pursuant to FRCP 26.1(a)(1) dated July 8, 2021;
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1 21. Plaintiffs' Third Supplement to Initial Disclosure of Witnesses and
2 Documents Pursuant to FRCP 26.1(a)(1) dated July 12, 2021;

3 22. Plaintiff Soldadera Sanchez's Supplemental Responses to LVMPD's First
4 Set of Interrogatories dated July 8, 2021;

5 23. Plaintiff Robert O'Brien's Supplemental Responses to LVMPD's First Set
6 of Interrogatories dated July 8, 2021;

7 24. Plaintiff Emily Driscoll's Supplemental Responses to LVMPD's First Set
8 of Interrogatories dated July 8, 2021;

9 25. Plaintiff Alison Kenady's Supplemental Responses to LVMPD's First Set
10 of Interrogatories dated July 8, 2021;

11 26. Plaintiff Tenisha Martin's Supplemental Responses to LVMPD's First Set
12 of Interrogatories dated June 8, 2021;

13 27. Plaintiff Soldadera Sanchez's Supplemental Responses to LVMPD's First
14 Set of Requests for Production of Documents dated July 8, 2021;

15 28. Plaintiff Robert O'Brien's Supplemental Responses to LVMPD's First Set
16 of Requests for Production of Documents dated July 8, 2021;

17 29. Plaintiff Emily Driscoll's Supplemental Responses to LVMPD's First Set
18 of Requests for Production of Documents dated July 8, 2021;

19 30. Plaintiff Alison Kenady's Supplemental Responses to LVMPD's First Set
20 of Requests for Production of Documents dated July 8, 2021;

21 31. Plaintiff Tenisha Martin's Supplemental Responses to LVMPD's First Set
22 of Requests for Production of Documents dated July 8, 2021;

23 32. Plaintiff Gabriela Molina's Supplemental Responses to LVMPD's First Set
24 of Requests for Production of Documents dated July 8, 2021;

25 33. Plaintiff Gabriela Molina's Second Supplemental Responses to LVMPD's
26 First Set of Requests for Production of Documents dated July 12, 2021;

1 34. Plaintiff Lance Downes-Covington's Supplemental Responses to
2 LVMPD's First Set of Requests for Production of Documents dated July 12, 2021;

3 35. Plaintiff Gabriela Molina's Supplemental Responses to LVMPD's First Set
4 of Interrogatories dated July 12, 2021;

5 36. Plaintiff Lance Downes-Covington's Supplemental Responses to
6 LVMPD's First Set of Interrogatories dated July 12, 2021;

7 37. Plaintiff Tenisha Martin's First Set of Interrogatories to LVMPD dated July
8 13, 2021;

9 38. Plaintiffs' Second Set of Requests for Production of Documents to LVMPD
10 dated July 13, 2021;

11 39. Plaintiff Tenisha Martin's Second Set of Interrogatories to LVMPD dated
12 July 14, 2021;

13 40. Plaintiffs' Third Set of Requests for Production of Documents to LVMPD
14 dated July 14, 2021;

15 41. Plaintiffs' Fourth Supplement to Initial Disclosure of Witnesses and
16 Documents Pursuant to FRCP 26.1(a)(1) dated September 15, 2021;

17 42. Plaintiff Tenisha Martin's Third Set of Interrogatories to LVMPD dated
18 September 15, 2021;

19 43. Plaintiffs' Fourth Set of Requests for Production of Documents to LVMPD
20 dated September 15, 2021;

21 44. Plaintiffs' First Set of Requests for Admission to LVMPD dated September
22 17, 2021;

23 45. Tenisha Martin's Responses to Lt. Kurt McKenzie's First Set of
24 Interrogatories dated December 16, 2021;

25 46. Soldadera Sanchez's Responses to Lt. Kurt McKenzie's First Set of
26 Interrogatories dated December 16, 2021;

1 47. Robert O' Brien's Responses to Lt. Kurt McKenzie's First Set of
2 Interrogatories dated December 16, 2021;

3 48. Lance Downes-Covington's Responses to Lt. Kurt McKenzie's First Set of
4 Interrogatories dated December 16, 2021;

5 49. Gabriela Molina's Responses to Lt. Kurt McKenzie's First Set of
6 Interrogatories dated December 16, 2021;

7 50. Emily Driscoll's Responses to Lt. Kurt McKenzie's First Set of
8 Interrogatories dated December 16, 2021;

9 51. Alison Kenady's Responses to Lt. Kurt McKenzie's First Set of
10 Interrogatories dated December 16, 2021;

11 52. Tenisha Martin's Responses to LVMPD's First Set of Requests for
12 Admissions dated December 16, 2021;

13 53. Soldadera Sanchez's Responses to LVMPD's First Set of Requests for
14 Admissions dated December 16, 2021;

15 54. Robert O'Brien's Responses to LVMPD's First Set of Requests for
16 Admissions dated December 16, 2021;

17 55. Lance Downes-Covington's Responses to LVMPD's First Set of Requests
18 for Admissions dated December 16, 2021;

19 56. Gabriela Molina's Responses to LVMPD's First Set of Requests for
20 Admissions dated December 16, 2021;

21 57. Emily Driscoll's Responses to LVMPD's First Set of Requests for
22 Admissions dated December 16, 2021;

23 58. Alison Kenady's Responses to LVMPD's First Set of Requests for
24 Admissions dated December 16, 2021;

25 59. Alison Kenady's First Set of Interrogatories to LVMPD dated April 1, 2022;

1 60. Emily Driscoll's Second Set of Interrogatories to LVMPD dated April 1,
2 2022;

3 61. Gabriella Molina's First Set of Interrogatories to LVMPD dated April 1,
4 2022;

5 62. Lance Downes-Covington's Second Set of Interrogatories to LVMPD dated
6 April 1, 2022;

7 63. Plaintiffs' Fifth Set of Requests for Production of Documents to LVMPD
8 dated April 1, 2022;

9 64. Robert O'Brien's First Set of Interrogatories to LVMPD dated April 1,
10 2022;

11 65. Plaintiffs' Second Set of Requests for Admissions to LVMPD dated April
12 1, 2022;

13 66. Sol Sanchez's First Set of Interrogatories to LVMPD dated April 1, 2022;

14 67. Plaintiffs' First Set of Requests for Production of Documents to Defendant
15 Joe Lombardo [Request Nos. 1-5] dated June 17, 2022;

16 68. Plaintiffs' First Set of Requests for Admissions to Defendant Tabatha
17 Dickson dated June 17, 2022;

18 69. Plaintiffs' First Set of Requests for Production of Documents to Defendant
19 Joe Lombardo [Request Nos. 1-4] dated June 17, 2022;

20 70. Soldadera Sanchez's Second Set of Interrogatories to LVMPD dated June
21 17, 2022;

22 71. Robert O'Brien's Second Set of Interrogatories to LVMPD dated June 17,
23 2022;

24 72. Emily Driscoll's Third Set of Interrogatories to LVMPD dated June 17,
25 2022;

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1 73. Lance Downes-Covington's Third Set of Interrogatories to LVMPD dated
2 June 17, 2022;

3 74. Plaintiffs' Sixth Set of Requests for Production of Documents to LVMPD
4 dated June 17, 2022;

5 75. Plaintiffs' Third Set of Requests for Admissions to LVMPD dated June 17,
6 2022;

7 76. Tenisha Martin's Fourth Set of Interrogatories to LVMPD dated June 17,
8 2022;

9 77. Lance Downes-Covington's First Set of Interrogatories to Officer Tabatha
10 Dickson dated June 17, 2022;

11 78. Soldadera Sanchez's First Set of Interrogatories to Joe Lombardo dated
12 June 17, 2022;

13 79. Soldadera Sanchez's First Set of Interrogatories to Lt. Kurt McKenzie dated
14 June 17, 2022;

15 80. Plaintiffs' First Set of Requests for Production of Documents to Defendant
16 Patricia Spencer dated June 17, 2022;

17 81. Plaintiffs' First Set of Requests for Production of Documents to Defendant
18 Dori Koren dated June 17, 2022;

19 82. Plaintiffs' First Set of Requests for Production of Documents to Joe
20 Lombardo [Request No. 1] dated June 17, 2022;

21 83. Plaintiffs' First Set of Requests for Production of Documents to Lt. Kurt
22 McKenzie dated June 17, 2022;

23 84. Tenisha Martin's First Set of Interrogatories to Lt. Kurk McKenzie dated
24 June 17, 2022;

25 85. Plaintiffs' Third Set of Requests for Admissions to LVMPD dated June 21,
26 2022;

1 86. Plaintiffs' Sixth Set of Requests for Production of Documents to LVMPD
2 dated June 21, 2022;

3 87. Emily Driscoll's Third Set of Interrogatories to LVMPD dated June 21,
4 2022;

5 88. Lance Downes-Covington's Third Set of Interrogatories to LVMPD dated
6 June 21, 2022;

7 89. Robert O'Brien's Second Set of Interrogatories to LVMPD dated June 21,
8 2022;

9 90. Soldadera Sanchez's First Set of Interrogatories to Lt. Kurt McKenzie dated
10 June 21, 2022;

11 91. Soldadera Sanchez's First Set of Interrogatories to Joe Lombardo dated
12 June 21, 2022;

13 92. Soldadera Sanchez's Second Set of Interrogatories to LVMPD dated June
14 21, 2022;

15 93. Plaintiffs' First Set of Requests for Admissions to Officer Tabatha Dickson
16 dated June 21, 2022;

17 94. Plaintiffs' First Set of Requests for Production of Documents to Joe
18 Lombardo [Request Nos. 1-5] dated June 21, 2022;

19 95. Plaintiffs' First Set of Requests for Production of Documents to Lt. Kurt
20 McKenzie dated June 21, 2022;

21 96. Plaintiffs' First Set of Requests for Production of Documents to Officer
22 Tabatha Dickson dated June 21, 2022;

23 97. Plaintiffs' First Set of Requests for Production of Documents to Patricia
24 Spencer dated June 21, 2022;

25 98. Plaintiffs' First Set of Requests for Production of Documents to Captain
26 Dori Koren dated June 21, 2022;

1 99. Lance Downes-Covington's First Set of Interrogatories to Officer Tabatha
 2 Dickson dated June 21, 2022;

3 100. Tenisha Martin's First Set of Interrogatories to Lt. Kurt McKenzie dated
 4 June 21, 2022;

5 101. Tenisha Martin's Fourth Set of Interrogatories to LVMPD dated June 21,
 6 2022;

7 102. Plaintiff Emily Driscoll's Requests for Admissions to LVMPD - Set One
 8 dated October 27, 2022.

9 103. Plaintiff Emily Driscoll's Interrogatories to LVMPD - Set Four dated
 10 October 27, 2022.

11 104. Plaintiff Emily Driscoll's Interrogatories to Tabatha Dickson - Set One
 12 dated October 27, 2022.

13 105. Plaintiff Emily Driscoll's Requests for Production of Documents to
 14 LVMPD - Set One dated October 27, 2022.

15 106. Plaintiff Emily Driscoll's Requests for Production of Documents to Tabatha
 16 Dickson - Set One dated October 27, 2022.

17 107. Plaintiff Emily Driscoll's Requests for Admissions to Tabatha Dickson -
 18 Set One dated October 27, 2022.

19 108. Plaintiff Gabriela Molina's Interrogatories to LVMPD - Set Two dated
 20 October 27, 2022.

21 109. Plaintiff Gabriela Molina's Interrogatories to Tabatha Dickson - Set One
 22 dated October 27, 2022.

23 110. Plaintiff Gabriela Molina's Requests for Production of Documents to
 24 LVMPD - Set One dated October 27, 2022.

25 111. Plaintiff Gabriela Molina's Requests for Production of Documents to
 26 Tabatha Dickson - Set One dated October 27, 2022.

1 112. Plaintiff Gabriela Molina's Requests for Admissions to LVMPD - Set One
2 dated October 27, 2022.

3 113. Plaintiff Gabriela Molina's Requests for Admissions to Tabatha Dickson -
4 Set One dated October 27, 2022.

5 114. Plaintiff Lance Downes-Covington's Interrogatories to LVMPD - Set Four
6 dated October 27, 2022.

7 115. Plaintiff Lance Downes-Covington's Interrogatories to Tabatha Dickson -
8 Set Two dated October 27, 2022.

9 116. Plaintiff Lance Downes-Covington's Interrogatories to Jordan Turner - Set
10 One dated October 27, 2022.

11 117. Plaintiff Lance Downes-Covington's Requests for Production of
12 Documents to LVMPD - Set One dated October 27, 2022.

13 118. Plaintiff Lance Downes-Covington's Requests for Production of
14 Documents to Tabatha Dickson - Set One dated October 27, 2022.

15 119. Plaintiff Lance Downes-Covington's Requests for Production of
16 Documents to Jordan Turner - Set One dated October 27, 2022.

17 120. Plaintiff Lance Downes-Covington's Requests for Admissions to LVMPD
18 - Set One dated October 27, 2022.

19 121. Plaintiff Lance Downes-Covington's Requests for Admissions to Tabatha
20 Dickson - Set One dated October 27, 2022.

21 122. Plaintiff Lance Downes-Covington's Requests for Admissions to Jordan
22 Turner - Set One dated October 27, 2022.

23 123. Soldadera Sanchez's Requests for Production of Documents to LVMPD -
24 Set One dated November 7, 2022.

25 124. Soldadera Sanchez's Requests for Admissions to LVMPD - Set One dated
26 November 7, 2022.

1 125. Robert O'Brien's Interrogatories to LVMPD - Set One dated November 7,
2 2022.

3 126. Robert O'Brien's Requests for Production of Documents to LVMPD - Set
4 One dated November 7, 2022.

5 127. Robert O'Brien's Requests for Admissions to LVMPD - Set One dated
6 November 7, 2022.

7 128. Alison Kenady's Interrogatories to LVMPD - Set Two dated November 7,
8 2022.

9 129. Alison Kenady's Requests for Production of Documents to LVMPD - Set
10 One dated November 7, 2022.

11 130. Alison Kenady's Requests for Admissions to LVMPD - Set One dated
12 November 7, 2022.

13 131. Tenisha Martin's Requests for Production of Documents to LVMPD - Set
14 One dated November 7, 2022.

15 132. Tenisha Martin's Requests for Admissions to LVMPD - Set One dated
16 November 7, 2022.

17 133. Plaintiffs' Fifth Supplement to Initial Disclosure of Witnesses and
18 Documents Pursuant to FRCP 26.1(a)(1) dated January 4, 2023;

19 134. Plaintiffs' Sixth Supplement to Initial Disclosure of Witnesses and
20 Documents Pursuant to FRCP 26.1(a)(1) dated January 20, 2023.

21 135. Tenisha Martin's Requests for Production of Documents to LVMPD – Set
22 Two, dated January 17, 2023

23 136. **Tenisha Martin's Requests for Production of Documents to LVMPD –**
24 **Set Three, dated April 18, 2023.**

1 **B. DEFENDANTS' DISCOVERY.**

2 1. LVMPD Defendants' Initial Disclosure of Witnesses and Documents
3 Pursuant to FRCP 26.1(a)(1) dated January 20, 2021.

4 2. LVMPD's First Set of Interrogatories to Plaintiff Lance Downes-Covington
5 dated March 12, 2021.

6 3. LVMPD's First Set of Interrogatories to Plaintiff Soldadera Sanchez dated
7 March 12, 2021.

8 4. LVMPD's First Set of Interrogatories to Plaintiff Robert O'Brien dated
9 March 12, 2021.

10 5. LVMPD's First Set of Interrogatories to Plaintiff Emily Driscoll dated
11 March 12, 2021.

12 6. LVMPD's First Set of Interrogatories to Plaintiff Alison Kenady dated
13 March 12, 2021.

14 7. LVMPD's First Set of Interrogatories to Plaintiff Tenisha Martin dated
15 March 12, 2021.

16 8. LVMPD's First Set of Interrogatories to Plaintiff Gabriela Molina dated
17 March 12, 2021.

18 9. LVMPD's First Set of Request for Production of Documents to Plaintiff
19 Lance Downes-Covington dated March 12, 2021.

20 10. LVMPD's First Set of Request for Production of Documents to Plaintiff
21 Soldadera Sanchez dated March 12, 2021.

22 11. LVMPD's First Set of Request for Production of Documents to Plaintiff
23 Robert O'Brien dated March 12, 2021.

24 12. LVMPD's First Set of Request for Production of Documents to Plaintiff
25 Emily Driscoll dated March 12, 2021.

26 13. LVMPD's First Set of Request for Production of Documents to Plaintiff
27 Alison Kenady dated March 12, 2021.

1 14. LVMPD's First Set of Request for Production of Documents to Plaintiff
2 Tenisha Martin dated March 12, 2021.

3 15. LVMPD's First Set of Request for Production of Documents to Plaintiff
4 Gabriela Molina dated March 12, 2021.

5 16. LVMPD Defendants' First Supplement to Initial Disclosures of Witnesses
6 and Documents Pursuant to FRCP 26.1(a)(1) dated July 20, 2021.

7 17. LVMPD's Answers to Plaintiff Lance Downes-Covington's First Set of
8 Interrogatories dated July 20, 2021.

9 18. LVMPD's Responses to Plaintiffs' First Set of Requests for Production of
10 Documents dated July 20, 2021.

11 19. LVMPD's Responses to Plaintiff Emily Driscoll's First Set of
12 Interrogatories dated August 3, 2021.

13 20. LVMPD's Supplemental Answers to Plaintiff Lance Downes-Covington's
14 First Set of Interrogatories dated August 3, 2021.

15 21. LVMPD's Supplemental Responses to Plaintiffs' First Set of Requests for
16 Production of Documents dated August 3, 2021.

17 22. LVMPD Defendants' Second Supplement to Initial Disclosures of
18 Witnesses and Documents Pursuant to FRCP 26.1(a)(1) dated August 4, 2021.

19 23. LVMPD's Supplemental Answers to Plaintiff Lance Downes-Covington's
20 First Set of Interrogatories dated August 9, 2021.

21 24. LVMPD Defendants' Third Supplement to Initial Disclosures of Witnesses
22 and Documents Pursuant to FRCP 26.1(a)(1) dated August 16, 2021.

23 25. LVMPD's Responses to Plaintiff Tenisha Martin's First Set of
24 Interrogatories dated August 16, 2021.

25 26. LVMPD's Responses to Plaintiff Tenisha Martin's Second Set of
26 Interrogatories dated August 16, 2021.

1 27. LVMPD's Responses to Plaintiffs' Third Set of Requests for Production of
2 Documents dated August 16, 2021.

3 28. LVMPD's Responses to Plaintiffs' Second Set of Requests for Production
4 of Documents dated August 30, 2021.

5 29. LVMPD's Responses to Plaintiff Tenisha Martin's Second Set of
6 Interrogatories dated August 30, 2021.

7 30. LVMPD Defendants' Fourth Supplement to Initial Disclosures of
8 Witnesses and Documents Pursuant to FRCP 26.1(a)(1) dated August 30, 2021.

9 31. LVMPD Defendants' Privilege Log dated August 30, 2021.

10 32. LVMPD's Amended Responses to Plaintiffs' Third Set of Requests for
11 Production of Documents dated September 13, 2021.

12 33. LVMPD's Amended Responses to Plaintiffs' Second Set of Requests for
13 Production of Documents dated September 13, 2021.

14 34. LVMPD's Amended Responses to Plaintiff Tenisha Martin's Second Set of
15 Interrogatories dated September 13, 2021.

16 35. LVMPD's Amended Responses to Plaintiff Emily Driscoll's First Set of
17 Interrogatories dated September 13, 2021.

18 36. Lt. McKenzie's First Set of Interrogatories to Plaintiff Lance Downes-
19 Covington dated September 22, 2021.

20 37. Lt. McKenzie's First Set of Interrogatories to Plaintiff Soldadera Sanchez
21 dated September 22, 2021.

22 38. Lt. McKenzie's First Set of Interrogatories to Plaintiff Robert O'Brien dated
23 September 22, 2021.

24 39. Lt. McKenzie's First Set of Interrogatories to Plaintiff Emily Driscoll dated
25 September 22, 2021.

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1 40. Lt. McKenzie's First Set of Interrogatories to Plaintiff Alison Kenady dated
2 September 22, 2021.

3 41. Lt. McKenzie's First Set of Interrogatories to Plaintiff Tenisha Martin dated
4 September 22, 2021.

5 42. Lt. McKenzie's First Set of Interrogatories to Plaintiff Gabriela Molina
6 dated September 22, 2021.

7 43. LVMPD's First Set of Requests for Admission to Plaintiff Lance Downes-
8 Covington dated September 22, 2021.

9 44. LVMPD's First Set of Requests for Admission to Plaintiff Soldadera
10 Sanchez dated September 22, 2021.

11 45. LVMPD's First Set of Requests for Admission to Plaintiff Robert O'Brien
12 dated September 22, 2021.

13 46. LVMPD's First Set of Requests for Admission to Plaintiff Emily Driscoll
14 dated September 22, 2021.

15 47. LVMPD's First Set of Requests for Admission to Plaintiff Alison Kenady
16 dated September 22, 2021.

17 48. LVMPD's First Set of Requests for Admission to Plaintiff Tenisha Martin
18 dated September 22, 2021.

19 49. LVMPD's First Set of Requests for Admission to Plaintiff Gabriela Molina
20 dated September 22, 2021.

21 50. LVMPD Defendants' Fifth Supplement to Initial Disclosures of Witnesses
22 and Documents Pursuant to FRCP 26.1(a)(1) dated October 11, 2021.

23 51. LVMPD's Responses to Plaintiffs' Fourth Set of Requests for Production
24 of Documents dated October 18, 2021.

25 52. LVMPD's Responses to Plaintiff Tenisha Martin's Third Set of
26 Interrogatories dated October 18, 2021.
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1 53. LVMPD's Responses to Plaintiffs' First Set of Requests Admission dated
2 October 20, 2021.

3 54. LVMPD's Answers to Plaintiff Lance Downes-Covington's Second Set of
4 Interrogatories dated May 5, 2022.

5 55. LVMPD's Answers to Plaintiff Alison Kenady's First Set of Interrogatories
6 dated May 5, 2022.

7 56. LVMPD's Answers to Plaintiff Robert O'Brien's First Set of
8 Interrogatories dated May 5, 2022.

9 57. LVMPD's Answers to Plaintiff Sol Sanchez's First Set of Interrogatories
10 dated May 5, 2022.

11 58. LVMPD's Responses to Plaintiffs' Fifth Set of Requests for Production of
12 Documents dated May 5, 2022.

13 59. LVMPD's Answers to Plaintiff Emily Driscoll's Second Set of
14 Interrogatories dated May 5, 2022.

15 60. LVMPD's Answers to Plaintiff Gabriella Molina's First Set of
16 Interrogatories dated May 5, 2022.

17 61. LVMPD's Responses to Plaintiffs' Second Set of Requests for Admissions
18 dated May 5, 2022.

19 62. LVMPD's Second Supplemental Answers to Plaintiff Lance Downes-
20 Covington's First Set of Interrogatories dated June 24, 2022.

21 63. LVMPD's First Supplemental Responses to Plaintiffs' Second Set of
22 Requests for Production of Documents dated June 24, 2022.

23 64. LVMPD's First Supplemental Answers to Plaintiff Tenisha Martin's
24 Second Set of Interrogatories dated June 24, 2022.

25 65. LVMPD's Second Supplemental Responses to Plaintiffs' First Set of
26 Requests for Production of Documents dated June 24, 2022.

1 66. Lt. Kurt McKenzie's Answers to Soldadera Sanchez's First Set of
2 Interrogatories dated August 8, 2022.

3 67. Lt. Kurt McKenzie's Answers to Tenisha Martin's First Set of
4 Interrogatories dated August 8, 2022.

5 68. Lt. Kurt McKenzie's Responses to Plaintiffs' First Set of Requests for
6 Production of Documents dated August 8, 2022.

7 69. Patricia Spencer's Responses to Plaintiffs' First Set of Requests for
8 Production of Documents dated August 8, 2022.

9 70. Tabatha Dickson's Responses to Plaintiffs' First Set of Requests for
10 Admissions dated August 8, 2022.

11 71. Tabatha Dickson's Answers to Lance Downes-Covington's First Set of
12 Interrogatories dated August 8, 2022.

13 72. LVMPD's Responses to Plaintiffs' Third Set of Requests for Admissions
14 dated August 8, 2022.

15 73. LVMPD's Answers to Lance Downes-Covington's Third Set of
16 Interrogatories dated August 8, 2022.

17 74. LVMPD's Answers to Soldadera Sanchez's Second Set of Interrogatories
18 dated August 8, 2022.

19 75. Captain Dori Koren's Responses to Plaintiffs' First Set of Requests for
20 Production of Documents dated August 8, 2022.

21 76. Tabatha Dickson's Responses to Plaintiffs' First Set of Requests for
22 Production of Documents dated August 8, 2022.

23 77. LVMPD's Answers to Robert O'Brien's Second Set of Interrogatories
24 dated August 8, 2022.

25 78. LVMPD's Answers to Tenisha Martin's Fourth Set of Interrogatories dated
26 August 8, 2022.

1 79. LVMPD's Responses to Plaintiffs' Sixth Set of Requests for Production of
 2 Documents dated August 8, 2022.

3 80. LVMPD's Answers to Emily Driscoll's Third Set of Interrogatories dated
 4 August 8, 2022.

5 81. LVMPD Defendants' Sixth Supplemental FRCP 26.1 Disclosures dated
 6 August 8, 2022.

7 82. LVMPD Defendants' Seventh Supplemental FRCP 26.1 Disclosures dated
 8 December 6, 2022.

9 83. Jordan Turner's Responses to Lance Downes-Covington's Requests for
 10 Production – Set One, dated December 6, 2022.

11 84. Jordan Turner's Responses to Lance Downes-Covington's Requests for
 12 Admission – Set One, dated December 6, 2022.

13 85. Jordan Turner's Responses to Lance Downes-Covington's Interrogatories –
 14 Set One, dated December 6, 2022.

15 86. Jordan Turner's Responses to Lance Downes-Covington's Requests for
 16 Admission – Set One, dated December 6, 2022.

17 87. Jordan Turner's Responses to Gabriela Molina's Requests for Production –
 18 Set One, dated December 6, 2022.

19 88. Tabatha Dickson's Reponses to Lance Downes Covington's Requests for
 20 Production – Set One, dated December 6, 2022.

21 89. Tabatha Dickson's Responses to Lance Downes-Covington's Requests for
 22 Interrogatories – Set One, dated December 6, 2022.

23 90. Tabatha Dickson's Responses to Lance Downes-Covington's Requests for
 24 Interrogatories – Set Two, dated December 6, 2022.

25 91. Tabatha Dickson's Responses to Lance Downes-Covington's Requests for
 26 Admission – Set One, dated December 6, 2022.

1 92. Tabatha Dickson's Responses to Lance Downes-Covington's Requests for
2 Production – Set One, dated December 6, 2022.

3 93. Tabatha Dickson's Responses to Gabriela Molina's Interrogatories – Set
4 One, dated December 6, 2022.

5 94. Tabatha Dickson's Responses to Gabriela Molina's Requests for Admission
6 – Set One, dated December 6, 2022.

7 95. Tabatha Dickson's Responses to Gabriela Molina's Interrogatories – Set
8 One, dated December 6, 2022.

9 96. Tabatha Dickson's Responses to Gabriela Molina's Requests for Production
10 – Set One, dated December 6, 2022.

11 97. Tabatha Dickson's Responses to Emily Driscolls' Requests for Admission
12 – Set One, dated December 6, 2022.

13 98. Tabatha Dickson's Responses to Emily Driscolls' Interrogatories – Set One,
14 dated December 6, 2022.

15 99. LVMPD'S Responses to Lance Downes Covington's Requests for
16 Production – Set One, dated December 6, 2022.

17 100. LVMPD'S Responses to Lance Downes Covington's Requests for
18 Admission – Set One, dated December 6, 2022.

19 101. LVMPD'S Responses to Lance Downes Covington's Interrogatories – Set
20 Four, dated December 6, 2022.

21 102. LVMPD's Responses to Emily Driscolls' Interrogatories – Set One, dated
22 December 6, 2022.

23 103. LVMPD's Responses to Emily Driscolls' Interrogatories – Set Four, dated
24 December 6, 2022.

25 104. LVMPD's Responses to Emily Driscolls' Requests for Admission – Set
26 One, dated December 6, 2022.

1 105. LVMPD's Responses to Emily Driscolls' Requests for Production – Set
2 One, dated December 6, 2022.

3 106. LVMPD's Responses to Gabriela Molina's Interrogatories – Set Two, dated
4 December 6, 2022.

5 107. LVMPD's Responses to Gabriela Molina's Requests for Production– Set
6 One, dated December 6, 2022.

7 108. LVMPD's Responses to Gabriela Molina's Requests for Admission – Set
8 One, dated December 6, 2022.

9 109. LVMPD Defendants' Eighth Supplemental FRCP 26.1 Disclosures dated
10 December 16, 2022.

11 110. LVMPD'S Responses to Tenisha Martin's Requests for Admission – Set
12 One, dated December 19, 2022.

13 111. LVMPD'S Responses to Soldadera Sanchez's Requests for Admission –
14 Set One, dated December 19, 2022.

15 112. LVMPD'S Responses to Robert O'Brien's Requests for Admission – Set
16 One, dated December 19, 2022.

17 113. LVMPD'S Responses to Alison Kenady's Requests for Admission – Set
18 One, dated December 19, 2022.

19 114. LVMPD'S Responses to Robert O'Brien's Interrogatories – Set One, dated
20 December 19, 2022.

21 115. LVMPD'S Responses to Alison Kenady's Requests for Production – Set
22 One, dated December 20, 2022.

23 116. LVMPD'S Responses to Robert O'Brien's Requests for Production – Set
24 One, dated December 20, 2022.

25 117. LVMPD's Responses to Soldadera Sanchez' Requests for Production – Set
26 One, dated December 20, 2022.

1 118. LVMPD'S Responses to Tenisha Martin's Requests for Production – Set
 2 One, dated December 20, 2022.

3 119. LVMPD'S Responses to Alison Kenady's Interrogatories – Set Two, dated
 4 January 4, 2023.

5 120. LVMPD'S Responses to Robert O'Brien's Interrogatories – Set Three,
 6 dated January 4, 2023.

7 121. LVMPD's Ninth Supplemental Disclosure of Witnesses and Documents
 8 Pursuant to FRCP 26.1(a)(1), dated February 16, 2023.

9 122. LVMPD's First Supplemental Answers to Plaintiff Robert O'Brien's First
 10 Set of Interrogatories, dated February 16, 2023.

11 123. LVMPD's First Supplemental Answers to Plaintiff Soldadera Sanchez's
 12 Second Set of Interrogatories, dated February 16, 2023.

13 124. LVMPD's Third Supplemental Responses to Plaintiffs' First Set of
 14 Requests for Production of Documents, dated February 16, 2023.

15 125. LVMPD's Second Supplemental Responses to Plaintiff's Second Set of
 16 Requests for Production of Documents, dated February 16, 2023.

17 126. LVMPD's First Supplemental Responses to Plaintiffs' Sixth Set of
 18 Requests for Production of Documents, dated February 16, 2023.

19 127. LVMPD'S Responses to Plaintiff Tenisha Martin's Requests for Production
 20 of Documents – Set One [*sic* Set Two], dated February 16, 2023.

21 128. LVMPD's Tenth Supplemental Disclosure of Witnesses and Documents
 22 Pursuant to FRCP 26.1(a)(1), dated February 24, 2023.

23 **C. DEPOSITIONS.**

- 24 1. LVMPD Defendants deposed Plaintiff Alison Kenady on August 9, 2022.
 25 2. LVMPD Defendants deposed Plaintiff Gabriela Molina on August 10,
 26 2022.

1 3. LVMPD Defendants deposed Plaintiff Emily Driscoll on August 11, 2022.
 2 4. LVMPD Defendants deposed Plaintiff Tenisha Martin on August 16, 2022.
 3 5. LVMPD Defendants deposed Plaintiff Lance Downes-Covington on
 4 August 19, 2022.
 5 6. LVMPD Defendants deposed Plaintiff Soldadera Sanchez on August 20,
 6 2022.
 7 7. Plaintiffs deposed Defendant Officer Jordan Turner on October 18, 2022.
 8 8. Plaintiffs deposed Defendant Officer Tabatha Dickson on October 24, 2022.
 9 Plaintiffs deposed Defendant Officer Evan Spoon on November 7, 2022.
 10 9. Plaintiffs deposed Defendant Retired Captain Patricia Spencer on
 11 November 15, 2022.
 12 10. Plaintiffs deposed Defendant Captain Dori Koren on November 22, 2022.
 13 11. Plaintiffs deposed Defendant Lt. Kurt McKenzie on December 21, 2022.
 14 **12. The Parties are working to reschedule the deposition of Defendants'**
 15 **FRCP 30(b)(6) designee(s), which were scheduled for March 14, 2023.**

16 13. **LVMPD Defendants deposed Plaintiff Robert O'Brien on March 24,**
 17 **2023.**

18 **II. DISCOVERY THAT REMAINS TO BE COMPLETED.**

19 The Parties are actively conducting discovery and have completed the majority of
 20 the written discovery and depositions. However, the Parties are continuing to meet and confer
 21 on outstanding discovery issues, including Plaintiffs' position that Defendants have not
 22 produced all relevant and responsive BWC video footage. Plaintiffs are also continuing to
 23 review voluminous number of body-worn camera (BWC) footage videos, as are Defendants.
 24

25 The Parties' primary remaining discovery tasks include: (1) Plaintiffs review of
 26 materials, including an additional 188GB of materials (on-going), produced as part of
 27 Defendants' Ninth and Tenth Supplemental Disclosures, review of Defendants' recent
 28

1 discovery responses; (2) resolution of meet and confer issues and motion practice if needed;
 2 (3) Plaintiffs' deposition of Defendant Las Vegas Metropolitan Police Department's FRCP
 3 30(b)(6) designee(s); (4) expert disclosures; (5) rebuttal reports; and (6) depositions of the
 4 experts.

5 **III. SPECIFIC DESCRIPTION OF WHY EXTENSION IS NECESSARY.**

6 This is the tenth request for an extension of discovery deadlines in this matter. The
 7 Parties request that the Discovery Plan and Scheduling Order deadlines be extended an
 8 additional sixty (60) days so that the Parties may complete the tasks above and efficiently
 9 manage expert disclosures.

10 The Parties acknowledge that, pursuant to Local Rule 26-3, the Parties must
 11 establish that good cause exists to extend the deadlines.

12 The Parties have been diligently conducting discovery and continue to conduct
 13 discovery, but an extension is still needed to efficiently conclude discovery and manage the
 14 case. Plaintiffs filed their Motion for Leave to File a Third Amended Complaint (ECF No.
 15 126) to substitute the true names of three previously unnamed officers, add two new claims
 16 (Wrongful Arrest and Malicious Prosecution), and add additional facts supporting Plaintiffs'
 17 claims, particularly regarding use of excessive force. The Court issued its Report and
 18 Recommendation in response to Plaintiffs' Motion for Leave to File a Third Amended
 19 Complaint on April 20, 2023, recommending that Plaintiffs' Motion be denied (ECF No.
 20 144). Plaintiffs' objections to the Court's Report and Recommendation are due May 4, 2023.
 21 Additionally, Defendants recently supplemented a variety of discovery responses and
 22 produced an additional 218 BWC footage videos. Given the number of BWC videos,
 23 Plaintiffs will need additional time to review. Further, Plaintiffs' counsel is continuing to
 24 meet and confer with Defendants' counsel regarding the FRCP 30(b)(6) deposition topics.
 25 Plaintiffs also intend to bring a Motion for Sanctions regarding the failure to activate BWCs
 26 and/or preserve BWC video footage. Meet and confer efforts are ongoing.

Likewise, the experts retained in this matter will also need to review the recent discovery responses, BWC videos, and all deposition transcripts, including the March 24, 2023, deposition of Plaintiff Robert O'Brien and the FRCP 30(b)(6) designees currently scheduled for in or about the end of May, after the current deadline for initial expert disclosures. The Parties are working with their respective experts to prepare their expert disclosures. However, as noted, the Parties contend that it is more efficient to allow further discovery to be completed before initial expert disclosures to minimize the need for supplementation.

Finally, the Parties together request this in good faith and to further the resolution of this complicated case on the merits, and not for any purpose of delay.

The Parties thus respectfully request an extension of time to extend the discovery in this matter to enable to them to conduct necessary discovery in this matter and so that this matter is fairly resolved on the merits. “Good cause to extend a discovery deadline exists ‘if it cannot reasonably be met despite the diligence of the party seeking the extension.’” *Derosa v. Blood Sys., Inc.*, No. 2:13-cv-0137-JCM-NJK, 2013 U.S. Dist. LEXIS 108235, 2013 WL 3975764, at 1 (D. Nev. Aug. 1, 2013) (quoting *Johnson v. Mammoth Recreations, Inc.*, 975 F.2d 604, 609 (9th Cir. 1992)); *see also* Fed. R. Civ. P. 1 (providing that the Rules of Civil Procedure “should be construed, administered, and employed by the court and the Parties to secure the just, speedy, and inexpensive determination of every action and proceeding”). As the procedural history of this case illustrates, the Parties have been diligent in litigating this matter. Additionally, counsel for the Parties in this matter are litigating several other unrelated matters (including against each other) which have competing demands. While competing demands of litigation are merely one of many reasons for the instant request, it should be noted that the other litigation between the same counsel involving similar issues can only benefit from the completion of discovery in this matter so that in other litigation, similar requests can be expedited and can further the resolution of those matters and the interests of justice. Indeed, counsel for the Parties continue to engage in settlement

1 discussions regarding this and the other matters they are litigating that stem from the BLM
2 protests.

3 Thus, the standards to extend all deadlines, including the expert deadlines, is
4 satisfied here.

5 Based on the foregoing stipulation and proposed deadlines plan, the Parties thus
6 respectfully request an extension of time to extend the discovery in this matter to enable to
7 them to conduct necessary discovery in this matter and so that this matter is fairly resolved
8 on the merits.

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1 **IV. PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING**
 2 **DEADLINES**

3 The Parties propose to add sixty (60) days to all current deadlines:

Item	Current Deadline	Proposed New Deadline
Amend Pleadings and Add Parties	June 14, 2022	Past/Unchanged
Initial Expert Disclosures	May 8, 2023	July 7, 2023
Rebuttal Expert Disclosures	June 5, 2023	August 4, 2023
Discovery Cut-Off	July 3, 2023	September 1, 2023
Dispositive Motions	August 24, 2023	October 23, 2023
Pretrial Order	September 5, 2023	November 6, 2023¹ (If dispositive motions are filed, the deadline for shall be suspended until thirty (30) days after the decision of the dispositive motions or further order of the Court.)

13 Dated this 5th day of May, 2023.

14 MCLETCHIE LAW

15 By: /s/ Pieter M. O'Leary

16 Margaret A. McLetchie, Esq.
 17 Nevada Bar No. 10931
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 19 Nevada Bar No. 15297
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 22 602 South 10th Street
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 24 Attorneys for Plaintiffs

13 Dated this 5th day of May, 2023.

14 MARQUIS AURBACH

15 By: /s/ Jackie V. Nichols

16 Craig R. Anderson, Esq.
 17 Nevada Bar No. 6882
 18 Jackie V. Nichols, Esq.
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 21 Las Vegas, Nevada 89145
 22 Attorneys for Defendants Las Vegas
 23 Metropolitan Police Department,
 24 Lieutenant Kurt McKenzie, Officer
 25 Tabatha Dickson, Captain Patricia
 26 Spencer and Captain Dori Koren

27 **ORDER**

28 IT IS SO ORDERED.

29 DATED: 5/8/2023

30 
 31 UNITED STATES MAGISTRATE JUDGE

32 ¹ 60 days from September 5, 2023, is Saturday, November 4, 2023.